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18 Attorney for Defendants

19 UNITED STATES DISTRICT COURT

20 DISTRICT OF NEVADA

21 Adobe Systems Incorporated,) Case No. 2:10-cv-00422-LRH-LRL
22 Plaintiff,)
23 v.) JOINT STIPULATION REGARDING
24 Joshua Christenson, et al.,) GOOGLE SUBPOENA PRODUCTION;
Defendants.) ~~[PROPOSED] ORDER~~

1 TO THE COURT:

2 Plaintiff Adobe Systems Incorporated (“Plaintiff” or “Adobe”) and Defendants Joshua
3 Christenson, an individual and d/b/a www.softwaresurplus.com, and Software Surplus Inc.
4 (collectively “Defendants”) hereby stipulate and agree as follows:

5 WHEREAS Plaintiff served a subpoena upon Google, Inc. (“Google”) on or about
6 September 2, 2010;

7 WHEREAS Defendants brought their “Emergency Motion to Quash Subpoena Issue to
8 Non-Party Custodian of Records Google, Inc.” on or about September 29, 2010;

9 WHEREAS the Parties stipulate and agree to resolve the dispute concerning the Google
10 subpoena as follows:

- 11 1. The Parties agree to have the responsive documents from Google be produced to
12 counsel for Defendants first for designations pursuant to the Protective Order entered in
13 this matter and for possible redactions within fourteen (14) calendar days upon receipt
14 by Defendants’ counsel of the documents from Google;
- 15 2. That any unredacted portions of the responsive documents be produced to Plaintiff’s
16 counsel within fourteen (14) calendar days upon receipt by Defendants’ counsel of the
17 documents from Google;
- 18 3. That if Defendants’ counsel proposes to make any redactions, she shall send a log of
19 any such proposed redactions with stated objections to Plaintiff’s counsel within
20 fourteen (14) calendar days; and

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1 4. That if any redactions are challenged by Plaintiff, Defendants will submit the
2 challenged redactions for *in camera* review before Magistrate Judge Foley.
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4 IT IS SO STIPULATED.

5 DATED: February 4, 2011

6 J. Andrew Coombs, A Professional Corp.

7 By: /s/ Annie S. Wang

8 J. Andrew Coombs

9 Annie S. Wang

10 Attorneys for Plaintiff Adobe Systems Incorporated

11 DATED: February 4, 2011

12 Law Office of Lisa Rasmussen

13 By: /s/ Lisa A. Rasmussen

14 Lisa A. Rasmussen

15 Attorney for Defendants Joshua Christenson, an
16 individual and d/b/a www.softwaresurplus.com, and
17 Software Surplus Inc.

18 IT IS SO ORDERED:

19 
20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: February 7, 2011

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that on the 4th day of February, 2011, I caused the documents entitled JOINT STIPULATION REGARDING GOOGLE SUBPOENA PRODUCTION; [PROPOSED] ORDER to be served as follows:

Attorneys of Record	Party Represented	Method of Service
<p>Lisa A. Rasmussen <i>lisa@lrasmussenlaw.com</i> Law Office of Lisa Rasmussen 616 South 8th Street Las Vegas, Nevada 89101</p>	<p>Defendants, Counter Plaintiffs, and Third Party Plaintiffs Joshua Christenson, an individual and d/b/a www.softwaresurplus.com; Software Surplus Inc.</p>	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service
<p>Robert L. Langford, Esq. Robert L. Langford & Associates 616 South 8th Street Las Vegas, NV 89101</p>	<p>Defendants, Counter Plaintiffs, and Third Party Plaintiffs Joshua Christenson, an individual and d/b/a www.softwaresurplus.com; Software Surplus Inc.</p>	<input type="checkbox"/> Personal Service <input type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input checked="" type="checkbox"/> Mail Service

DATED this 4th day of February, 2011.



 Katrina Bartolome